

**Federal Defenders
OF NEW YORK, INC.**

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December 3, 2021

Via ECF

The Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Willie Dennis
20 Cr. 623 (LGS)**

Dear Judge Schofield,

I write on behalf of Willie Dennis to respectfully request a modification of the conditions of Mr. Dennis's pretrial release in this matter. Specifically, we request that the Court modify the conditions of Mr. Dennis's pretrial release to allow him to reside primarily at his parents' home in the Central District of Florida, at the address that has been provided to Pretrial Services and the Government. The Government and Pretrial Services consent to this request.

At Mr. Dennis's presentment, Magistrate Judge Wang ordered Mr. Dennis to be released on a \$200,000 personal recognizance bond, co-signed by three financially responsible persons; with travel restricted to the Southern and Eastern Districts of New York; for Mr. Dennis to surrender all travel documents and make no new travel document applications; for Mr. Dennis to be supervised by Pretrial Services, as directed; for Mr. Dennis to not possess any firearms; for Mr. Dennis to seek employment; for Mr. Dennis not to contact persons identified by the Government; for Mr. Dennis to not create any new email accounts or open any new phone accounts without Pretrial Services' approval; and for Mr. Dennis to be placed on home detention, to be enforced by electronic monitoring as directed by Pretrial Services. As of the date of this letter, Mr. Dennis's co-signers have all been approved and have verbally agreed to the terms and conditions of Mr. Dennis's bond.

As the defense raised at the presentment, Mr. Dennis's home in New York has been undergoing significant construction and remains in disrepair (e.g., missing walls, floors, furniture, and a working kitchen), with construction workers entering the home daily to perform heavy construction. Pretrial Services also performed a home visit and confirms that the home is inhabitable at this time. In addition, ownership of the home may soon be transferred in connection with Mr. Dennis's Family Court litigation and obligations. As such, we believe that Mr. Dennis should not reside in his current home, but should reside at his parents' home in

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Florida. Pretrial Services has confirmed that, if approved by the Court, supervision can be transferred to the Central District of Florida.

Accordingly, we respectfully request that the Court modify the terms of Mr. Dennis's pretrial release to permit him to reside at his parents' home in Florida, and that Mr. Dennis be permitted to travel (with approval from Pretrial Services) to and from the Central District of Florida, Southern and Eastern Districts of New York, and District of New Jersey (for flights to/from Newark Airport). In addition, due to the advanced age and declining health of Mr. Dennis's parents, we respectfully request that (with approval from Pretrial Services) Mr. Dennis be permitted to accompany his parents to medical appointments and to perform routine, approved tasks on their behalf that he is otherwise permitted to engage in for himself.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Neil P. Kelly
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cc: AUSA Sarah Kushner
cc (via email): Pretrial Services Officer Joshua Rothman